

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEARNING ANNEX HOLDINGS, LLC,
LEARNING ANNEX, LLC, and
LEARNING ANNEX, L.P.,

Plaintiffs,

09 Civ. 4432 (SAS) (GWG)

v.

RICH GLOBAL, LLC and
CASHFLOW TECHNOLOGIES, INC.,

Defendants.

**Learning Annex Updated Deposition Designations with Defendant's
Objections and Counter-Designations**

Plaintiffs' Designation	Defendant's Objection	Defendant's Counter-Designation	Plaintiffs' Objections to Counter-Designation
Sharon Lechter (11/19/09)			
6:09-6:10			
7:20-8:03	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404). Inadmissible in light of <i>in limine</i> ruling re: promotional activities.		

9:06-10:04	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), hearsay (Fed. R. Evid. 801, 802).		
12:08 – 13:09	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).		
18:24 – 19:22	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404). Inadmissible in light of <i>in limine</i> ruling re: promotional activities.		
32:06-32:23	Irrelevant (Fed. R. Evid. 401, 402).		
34:19-35:13	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).		

37:01-39:07	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), hearsay (Fed. R. Evid. 801, 802).		
44:22-45:07	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404). Inadmissible in light of <i>in limine</i> ruling re: promotional activities.		
47:17 - 48:23	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).		
49:15-50:4	Hearsay (Fed. R. Evid. 801, 802).	50:5-10	Relevance (excluded pursuant to Court's ruling)
52:11-52:17	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).	59:2-60:9; 103:13-106:5	59:2-60:9 - Relevance (excluded pursuant to Court's ruling); hearsay 103:13-106:5 - Relevance (excluded pursuant to Court's ruling); form; hearsay

53:16-55:09	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).	59:2-60:9; 103:13-106:5	59:2-60:9 - Relevance (excluded pursuant to Court's ruling); hearsay 103:13-106:5 - Relevance (excluded pursuant to Court's ruling); form; hearsay
57:1-59:01		59:2-60:9; 103:13-106:5	59:2-60:9 - Relevance (excluded pursuant to Court's ruling); hearsay 103:13-106:5 - Relevance (excluded pursuant to Court's ruling); form; hearsay
63:04-63:11	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).	59:2-60:9; 103:13-106:5	59:2-60:9 - Relevance (excluded pursuant to Court's ruling); hearsay 103:13-106:5 - Relevance (excluded pursuant to Court's ruling); form; hearsay
87:14-88:02	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403), inadmissible character evidence (Fed. R. Evid. 404), hearsay (Fed. R. Evid. 801, 802). Inadmissible in light of <i>in limine</i> ruling re: reasons for termination.		

93:01-93:07			
101:20-102:20	Irrelevant (Fed. R. Evid. 401, 402), unfairly prejudicial, confuses the issues, misleading, delay (Fed. R. Evid. 403).		